

UNITED STATES DISTRICT COURT FOR
SOUTHERN DISTRICT OF NEW YORK

HUDSON YARDS CONSTRUCTION LLC,

Plaintiff,

-against-

BUILDING AND CONSTRUCTION TRADES
COUNCIL OF GREATER NEW YORK AND
VICINITY and GARY LaBARBERA,

Defendants.

Case No.: 18 CIV 02376 (GHW)(DCF)
ECF Case

**DECLARATION OF MICHAEL J. BRENNER
IN SUPPORT OF PLAINTIFF'S MOTION TO REMAND**

I, Michael J. Brenner declare the following under penalty of perjury under the laws of the United States:

1. I am a Director and Executive Vice President of the sole general partner of The Related Companies, L.P. ("Related"). I submit this declaration in support of the motion by plaintiff Hudson Yards Construction LLC ("HYC") for an order pursuant to 28 U.S.C. § 1447 remanding this case to its original forum, the Supreme Court of the State of New York, New York County.

2. HYC is a Delaware limited liability company registered and authorized to do business in the State of New York and having a principal place of business at 60 Columbus Circle, New York, New York.

3. The sole member of HYC is Hudson Yards Holdings LLC ("HYH"). HYH is a Delaware limited liability company registered and authorized to do business in the State of New York and having a principal place of business at 60 Columbus Circle, New York, New York.

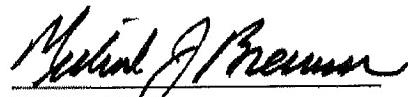
4. The sole member of HYH is Related. Related is a New York limited partnership having its principal place of business at 60 Columbus Circle, New York, New York.

5. I am a limited partner of Related. Stephen M. Ross is a limited partner of Related. Related's general partner is The Related Realty Group, Inc. ("RRG"), a Delaware corporation. RRG's sole stockholder is Stephen M. Ross.

6. Stephen M. Ross is a resident and domiciliary of the state of New York.

7. I am a resident and domiciliary of the state of New York.

Dated: New York, New York
April 24, 2018


Michael J. Brenner